



*Operates the statewide
Turnpike System as
part of the Florida
Department of
Transportation*

RICK SCOTT
Governor

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March 25, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325
Washington, DC 20554

RE: Request by Progeny LMS, LLC for Waiver of Certain Multilateration and
Monitoring Service Rules. WT Docket No. 11-49

Secretary Dortch:

I am contacting you on the behalf of the users of the SunPass prepaid toll system and Florida's Turnpike Enterprise regarding the above referenced subject. The SunPass prepaid toll system and Florida's Turnpike Enterprise is part of the Florida Department of Transportation. The SunPass system is the 4th largest toll system in miles, 2nd largest toll system in revenue in the United States and serves over 1.6 million customer transactions daily. While recognizing the deadline for filing comments regarding this matter has passed, Florida's Turnpike Enterprise respectfully petitions the Commission to accept these comments. The comments do not seek to raise a new issue, only to support the comments filed by others.

The SunPass system uses radio frequency identification that operates in the 915 megahertz (MHz) band. The system is comprised of base stations licensed by the Federal Communications Commission (FCC) on a co-primary geographic area basis and in-vehicle (mobile) devices that operate under part 15 of the FCC rules and communicate with the base stations. The SunPass system currently has more than 5.1 million mobile devices issued to customers across Florida and the US.

SunPass mobile devices also interoperate with multiple other tolling agencies such as Orlando Orange County Expressway Authority (OOCEA), Miami-Dade Expressway Authority (MDX), Garcon Point Bridge, Mid-Bay Bridge, LeeWay, Tampa-Hillsborough Expressway Authority (THEA) and the Osceola Parkway.

The 915 MHz frequency band used by the SunPass system is the same frequency which all electronic toll collection systems in the United States currently operate on, as well as in other systems such as the commercial vehicle highway weigh station preclearance systems which is a major part of the US Department of Transportation's Federal Motor Carrier Safety Administration's Commercial



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Vehicle Information Systems and Networks ("CVISN") and other intelligent traffic monitoring devices.

The SunPass prepaid toll system and Florida's Turnpike Enterprise supports the comments submitted by Kapsch TrafficCom IVHS, Inc.¹, a tolling equipment manufacturer, regarding Progeny's October 31 submission. We are deeply concerned that the October 31 Progeny report was limited to analyzing the operations of three companies that are not reflective of tolling equipment that operates with characteristics that are very similar to ours. We respectfully request that the FCC direct Progeny (1) to provide a response to Kapsch TrafficCom IVHS, Inc.² recommended changes to Progeny's systems operation and (2) to conduct interference testing with Kapsch TrafficCom IVHS, Inc. and submit a written report to the FCC confirming that Progeny's systems will not interfere with our existing Non Multilateration Location and Monitoring System operations, before the FCC makes a final decision on whether or not to allow Progeny permission to operate mobile radio transmitters and high power base stations as they've proposed.

Sincerely,

William J. Kesselring
Deputy Directory, Toll Systems

¹ See Comments of Kapsch TrafficCom IVHS Inc., WT Docket No. 11-49 (filed Dec. 21, 2012) ("Kapsch December 2012 Comments").

² See Comments of Kapsch TrafficCom IVHS Inc., WT Docket No. 11-49 (filed March 15, 2012) ("Kapsch March 2012 Comments").